

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

MICHELLE ANDERSON, an individual,  
On Behalf of Herself and All Others  
Similarly Situated,

Plaintiff,

v.

TRAVELEX INSURANCE SERVICES  
INC. and TRANSAMERICA CASUALTY  
INSURANCE COMPANY,

Defendants.

Case No. 8:18-cv-00362-JMG-SMB

**PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff Michelle Anderson hereby moves the Court to enter the proposed Final Approval Order and Judgment, which, *inter alia*: (1) finally approves the class action Settlement reached in the matter; (2) certifies the Settlement Class; (3) appoints Plaintiff Michelle Anderson as the Class Representative; (4) appoints Shanon J. Carson, Peter R. Kahana, Lane L. Vines, Y. Michael Twersky, and John G. Albanese of Berger Montague PC as Lead Counsel for the Settlement Class; (5) approves the Notice Plan and Notice issued to members of the Settlement Class, and binds all Settlement Class Members to the Final Approval Order and Judgment; (6) approves the distribution plan for the Net Settlement Fund as set forth in the Settlement Agreement; and (7) bars Settlement Class Members from asserting any claims for which a Release is given in the Settlement.

In support of her Motion, Plaintiff relies on the concurrently filed Memorandum of Law in support thereof, the exhibits attached thereto, and the Final Approval Hearing. Defendants Travelex Insurances Services, Inc., and Transamerica Casualty Insurance Company do not oppose the relief sought in this Motion.

Dated: September 1, 2021

Respectfully submitted,

/s/ John G. Albanese

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 1, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF:

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